

## **A response to the Government consultation “Planning for the Future”**

The Hitcham and Taplow Society comments as follows. The Society has been in existence for some sixty years. It has a main objective to ensure that all development within the district is of the highest standard and preserves the quality of the environment. It represents a significant proportion of the residents of Taplow (Buckinghamshire).

Abbreviations:

LA     Local Planning Authority such as a County or Unitary  
LP     The Local Plan of an LA

### **Summary view**

England is the most centrally controlled country in the developed western world. The proposals remove yet more levels of choice from LAs, transferring them to distant bureaucrats. The ability of communities and individuals to engage with decision processes is drastically curtailed despite many statements in the document to the contrary – this is clearly by design as a way to speed up decision making. The field is strongly tilted towards developers and landowners. This is deeply undemocratic.

The time frames proposed are quite unrealistic. Together with the recently completed consultation on housing numbers, with its message of drastic increases in house-building in the very short term, the proposals place intolerable workloads on LAs which the planning world is not resourced to handle. This will directly lead to rushed, un-researched and un-thought through plans that will result in uncertainty and chaos for many years, producing bad developments.

The two consultations together do nothing to solve the serious deficiencies in housing supply at the lower income levels where house buying is never going to be an option. They will free developers to build only the most profitable dwellings on prime land, which is not what the country needs.

If the whole planning system is to be overhauled then there are significant omissions. There is no country wide framework in support of the “levelling up” vision desired by the government. Without this no amount of “affordability” adjustments will have any effect on prices in desirable areas.

We welcome the aspirations for a better quality of house build and concerns for supporting infrastructure and the environment but there is little of any substance to ensure their delivery. In particular house building on the scale proposed will not be accepted without much more specific commitments on how infrastructure will be developed at local level.

We support the drive for much enhanced technology to make all planning matters more accessible and hopefully transparent

We do not directly oppose the transfer to a zoning and rules based approach but think the problems have not been sufficiently researched to have confidence in the outline approach described. We suspect there has been very little involvement from Local Authorities in assessing the scale of problems and benefits. It will be critical as to with whom and how these allocations are agreed. Absence of any detail on this is very disturbing.

At our local level we consider that the present proposals will reduce the scope of Neighbourhood Plans.

Overall our view is that the proposals abandon almost all safeguards held in the current planning regime in favour of shortening application approval times. This drive for speed is unjustified if one looks at the current levels of house building being achieved. The numbers presented by the government (187,000pa planned vs 300,000pa needed) are seriously misleading as we stated in our comments on the earlier consultation.

The white paper is at far too high a level, missing almost all the information that would allow us to make a reasoned judgement. No evidence is presented to justify the radical reductions in public involvement and it appears not be informed by the practical experience of LA planners.

In its present form it must be rejected as being likely to do far more harm than good. It would set back public confidence and trust in government for many years.

Roger Worthington  
Secretary Hitcham and Taplow Society  
c/o Littlemere, River Road SL6 0BB

## Responses to some specific queries

**The proposals are far reaching and of very broad impact. We only comment on those queries where we think we may be directly affected and have sufficient understanding of the issue.**

**Q3.** *Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?*

We disagree with the statement that it will be “much easier to contribute your views” The major thrust of the proposals is to reduce the ability of citizens to contribute to planning matters.

We would like information to be easily available on council web sites with the ability of citizens to request automatic notification of actions in declared areas of interest.

**Q4.** *What are your priorities for planning in your local area?*

Protection of existing heritage, quality of new developments, local infrastructure to keep pace with development

**Q5.** *Do you agree that Local Plans should be simplified in line with our proposals?*

No. We agree that Local Plans are in need of significant reform but the proposals are not acceptable. We support the introduction of national rules (provided they are adequately tested) but LAs require more say than the proposals allow. They remove almost all ability of an LA to configure an LP in accordance with local interest. The abolition of the ability of an LA to materially influence housing numbers within its LP is unacceptable.

**Q6.** *Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?*

We agree with the approach to minimise endless repetition by use of national standards for common requirements but the implementation must be carefully tested against the experience of LAs, who must retain the right to add policies to recognise local issues.

**Q7(b).** *How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?*

This problem arises from the government imposition of mandatory housing numbers on an LA. The “Duty to Cooperate” failed as the existing house numbers required were beyond the capacity of LAs in an area to accommodate so they could not agree and the problem remains unsolved. The new paper offers no solution to this problem. As current government policy identifies even greater housing numbers the problem becomes worse. The government has to be seen to take responsibility for resolutions and not push the problem back down to the individual LAs with arbitrary procedural requirements and penalties. i.e. no Duty to Agree.

**Q8(a).** *Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?*

Not in the short term and its form should not be an algorithm based process that centrally mandates total housing numbers to a political target. Any standard must show how local considerations are included as well as nationally defined types of constraint. In the longer term a standard is desirable but currently even the use of historic data may be unsound as

both Brexit and Covid-19 are having serious economic impact with unknown effects on demand and possibly on house locations as working habits change. A very pragmatic approach is needed currently.

There also appears to be a disconnect in the process. The white paper asks the question as to whether a standard method should be used. However, the earlier consultation on housing numbers clearly shows a government intention to introduce such a system immediately in advance of legislation from the white paper.

**Q8(b).** *Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?*

No. Affordability is what prevents everyone in the country from moving to more desirable areas.. Logically it would mean that Westminster should have blocks of “affordable” housing. Is that the intention?

**Q9(a) / Q9(b)** *Automatic outline consent within zones?*

As it stands the answer is NO. Automatic outline consent would only be acceptable if the zoning approach was far more sophisticated than that proposed.

**Q12.** *Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?*

NO. As the process for approving individual application removes much of the ability of communities to raise objections it is essential that the enabling LP is carefully scrutinised. The six week stage three is the only point at which the public can assess the merit of a draft LP. However it is done in parallel with approval from the Inspectorate. Serious public comment on the LP will necessarily take time to produce while the Inspector is assessing the “raw” LP. It is quite unrealistic to conduct these tasks in parallel. In reality only the Inspectors view will matter. The proposal reduces community involvement to a fig leaf. Penalties on LAs again work to reduce true local accountability. When the planning laws cease to be changed on an annual basis as is the current practice then a limit may have merits. The current proposals to upend the entire system while seriously increasing mandated housing growth levels takes serious time to understand, assimilate and find acceptable solutions and compromises. An artificial deadline will lead to chaos and uncertainty with an almost guaranteed rash of bad developments. It is in the interest of an LA to have a plan in place – they need help, not deadlines.

**Q13(a).** *Do you agree that Neighbourhood Plans should be retained in the planning system?*

YES

**Q13(b).** *How can the neighbourhood planning process be developed to meet our objectives?*

We have concerns that the prescriptive details of the proposals will curtail the current scope of Neighbourhood Plans. The present criteria that NPs may be side-lined if more than two years old must be removed and an NP placed on the same status level as an LP

**Q15.** *What do you think about the design of new development that has happened recently in your area?*

This has been of high quality but only because present planning arrangements supported extensive local involvement that would be removed by the proposals.

**Q16.** *Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?*

Sustainability has ceased to have much meaning, being a grossly overused word by government.

Our concerns for a thriving locality include:

Avoidance of overstressing local infrastructure by unfettered development.

Ensuring that government statements on “Protecting the Green Belt” actually have meaning.

The use of this phrase by government during the most recent round of required housing numbers growth was unfortunate as it meant exactly the opposite i.e. We will protect what is left after removing significant areas under the guise of “exceptional circumstances”. We fully expect another round of “exceptional circumstances”.

**Q19.** *Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?*

YES we support the approach but wonder how effective it can be in practice.

**Q20.** *Do you agree with our proposals for implementing a fast-track for beauty?*

NO. We have reservations that the “approved” house types will always be used by developers to ensure application success, leading to undesired uniformity across the country and the stifling of innovative design. Again it would curtail the power of an LA to influence desirable local character.

It is excellent that quality of design etc. is to be better recognised. This can be relatively easy to achieve at the higher end of the market but becomes much harder at the lower end. This can be seen in recent mixed developments where the “affordable” element is clearly seen as shoddy next to the private section. The question arises as to who decides. Guidelines are fine but much comes down to human views. Are planning officers to be retrained as quality experts? Their present skill set is centred on detailed evaluation of local policies and planning law, not aesthetics or sociology.

The suggested frameworks are very much to be welcomed but the supporting judgement process must be robust enough to stand up to determined developers who are adept at pleading special circumstances.

To be effective, all these criteria must be FULLY in place before the new planning approvals process becomes law. It will be all too tempting to have fine words that don’t have enough teeth.

**Q21.** *When new development happens in your area, what is your priority for what comes with it?*

Design of new buildings. Better local infrastructure